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By ECF

The Honorable John F. Keenan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1930
New York, NY 10007-1312

Re: *Khaldei v. Kaspiev*, 10 Civ. 8328 (JFK) (GWG)

Dear Judge Keenan:

We write on behalf of Defendant Kalman Kaspiev in response to the August 1, 2014 letter from Plaintiff's counsel, which requests oral argument on Plaintiff's latest motion for reconsideration so that Plaintiff's counsel can "ensure as much as possible that the Court understands and considers Plaintiff's arguments on the motion for reconsideration." Defendant opposes Plaintiff's request; there is no need for oral argument. The Court's June 9, 2014 Opinion & Order ("June Order") clearly and carefully considers Plaintiff's arguments. None of the litany of missives that Plaintiff's counsel lobs at the June Order entitles Plaintiff to reconsideration. That Plaintiff's counsel does not even claim, either in the opening brief or reply brief, to meet the applicable standard for reconsideration underscores this fact. We are tired of Plaintiff's counsel's tactics, which have unnecessarily delayed the resolution of this case – in which Defendant's counsel is appearing *pro bono* – and wasted precious judicial resources. The upcoming status conference scheduled for August 21 should be used to discuss the remaining discovery the parties need to conclude this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Margaret A. Dale".

Margaret A. Dale

cc: Daniel Rothstein, Esq. (by electronic mail and ECF)
Joshua H. Abramson, Esq. (by electronic mail and ECF)